

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

FIFTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS HATFIELD  
(UPS/USPS-T16-25)

(September 8, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Hatfield (UPS/USPS-T16-25).

Respectfully submitted,



John E. McKeever  
Albert P. Parker, II  
Stephanie Richman  
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Of Counsel.

**FOURTH SET OF INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS HATFIELD**

**UPS/USPS-T16-25.** Have you or the Postal Service conducted any tests, surveys or analyses to confirm the transportation costs estimated to be saved or avoided under the DBMC Parcel Post Service? If so, please identify, describe and provide the results of all such tests, surveys, and analyses, and provide copies of all notes, reports, workpapers and other source documents used. If not, please explain how the Postal Service can confirm and substantiate the accuracy of estimated avoided costs for DBMC mailings.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

  
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Albert P. Parker, II

Dated: September 8, 1997  
Philadelphia, PA